IN THE UNITED STATES DISTRICT COURT FOR THE MIDDLE DISTRICT OF TENNESSEE NASHVILLE DIVISION

BRAD AMOS,	
Plaintiff,]
vs.	Case No: 3:21-cv-00923
THE LAMPO GROUP, LLC, d/b/a RAMSEY SOLUTIONS; DAVE RAMSEY]]] JURY DEMAND
Defendants.]

<u>PLAINTIFF'S MOTION FOR AN EXTENSION</u> TO RESPOND TO DEFENDANTS MOTIONS TO DISMISS

Comes now the Plaintiff, Brad Amos, and respectfully requests a brief extension to respond to both Defendants' Motions to Dismiss. (Docs. 12, 14).

On February 11, 2022, Defendant Lampo and Defendant Dave Ramsey both submitted individual motions to dismiss Plaintiff's complaint in this matter. Pursuant to this court's order and Local Rule 7.01, Plaintiff has until Friday, February 25, 2022 to respond. All four (4) of Plaintiff's attorneys are currently in previously scheduled depositions this week in 4 other cases, several of these depositions require travel to Atlanta.

Further, the parties tried to work out a resolution to the Motions, however they could not come to an agreement as to all of the claims made by Defendants in their Motion. After these negotiations ultimately failed this morning, Defendants decided they needed to oppose this motion.

However, Plaintiff has agreed to look at some of the issues raised in Defendants Motions and perhaps file an Amended Complaint addressing some but not all of Defendants' concerns. The

extension will continue to allow the parties to work on some of the issues contained in the Motions to Dismiss.

Plaintiff respectfully moves to grant a seven (7) day extension to respond to Defendants' motions to dismiss, setting the new deadline for Friday, March 4, 2022.

Respectfully,

THE EMPLOYMENT AND CONSUMER LAW GROUP

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CERTIFICATE OF SERVICE

I hereby certify that a true and exact copy of the foregoing was sent via the Court's electronic case filing system to the following on this the 22nd day of February 2022:

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